

Joint Summary of Issues and Engagement

BAPTISTE NICKEL PROJECT

Pursuant to Section 14(1) of the Impact Assessment Act, S.C. 2019, c.28, s.1

Pursuant to Section 13(5) of the Environmental Assessment Act, S.B.C. 2018, c.51

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Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada



EAO

Environmental
Assessment Office

Introduction

FPX Nickel Corp. (FPX) is proposing to construct, operate and decommission a new open-pit nickel mine, located approximately 80 kilometres northwest of Fort St. James in central British Columbia (B.C.). As proposed, the Baptiste Nickel Project (the project) would include a mine site, associated infrastructure and a transmission line to an existing substation near Fraser Lake. FPX is considering two routes for road access, primarily utilizing existing and upgraded forest service roads. The project would have an approximate average annual processing rate of 162,000 tonnes of ore per day and would operate for 28 years. The production capacity of the project means that it is subject to consideration under the federal *Impact Assessment Act* (IAA) and the B.C. *Environmental Assessment Act* (B.C. Act).

On January 22, 2026, the Impact Assessment Agency of Canada (IAAC) determined that the project meets the definition of a designated project under the IAA and that the Initial Project Description (IPD) meets federal requirements. On January 22, 2026, the Environmental Assessment Office (EAO) approved the IPD and Engagement Plan for the project. These actions by IAAC and the EAO marked the beginning of the federal Planning phase and the provincial Early Engagement phase of the project.

The Planning and Early Engagement phases are important preparatory stages during which meaningful conversations can begin about the project prior to IAAC determining whether further federal impact assessment is required and the EAO determining the requirements for a provincial environmental assessment. To support the Planning and Early Engagement phases, IAAC and the EAO shared the IPD with, and sought to collect questions and understand views about the project from potentially affected First Nations, surrounding communities, provincial and federal subject matter experts, and the public.

This Joint Summary of Issues and Engagement (the Joint Summary, this document) has been prepared and issued by IAAC and the EAO. The Joint Summary includes:

- A summary of early engagement with First Nations;
- A summary of comments received from the public and provincial and federal subject matter experts;
- Direction from the EAO to FPX to consider and respond to comments received during Early Engagement; and
- Direction from IAAC to FPX to consider and respond to a list of key issues identified during the Planning phase.

First Nations' early engagement

The project, including proposed transmission line and access routes, is located in the territories of the Carrier (or Dakelh) and the Sekani peoples: Tl'azt'en Nation, Binche Whut'en, Yekooche First Nation, Takla Nation, Nak'azdli Whut'en, Lake Babine Nation, Nadleh Whut'en First Nation, and Stellat'en First Nation.

As part of initiating early discussions on the project and scope of assessment, IAAC and the EAO sent letters to these potentially affected First Nations on January 23, 2026, to identify their interest in the project, how they may want to be involved in the assessment, and if they have any views on the EAO's request to substitute its provincial environmental assessment process under the B.C. Act, which would satisfy the requirements of the federal impact assessment, should one be required. A substituted assessment process allows another jurisdiction to conduct the assessment of certain major projects instead of the federal government if certain conditions are met. If a project requires assessments by both federal and provincial governments, the Province can ask to lead the process on behalf of both levels of government, using its assessment process and following its timelines. It allows for a single assessment that meets federal and provincial requirements, supporting the goal of "one project, one review."

Prior to IPD submission, and during the first 90 days of Planning/Early Engagement, IAAC and the EAO met with the First Nations noted above. Tl'azt'en Nation, Binche Whut'en, Yekooche First Nation, Takla Nation, Nak'azdli Whut'en, Lake Babine Nation, Nadleh Whut'en First Nation, and Stelat'en First Nation indicated their interest in being involved in the assessment as it progresses.

IAAC and the EAO travelled to Tache to meet with Tl'azt'en Nation members and Keyoh holders on February 18 and February 19, 2026. Attendees raised concerns about potential project impacts on salmon-bearing streams; women, girls and gender-based violence; continuing ability of members to use the land for hunting, fishing and harvesting; future generations; and the risks of increased drug traffic in the community and tailings dam failure. IAAC and the EAO also spoke with a group of students at the Eugene Joseph Elementary School about the impact/environmental assessment and heard perspectives from youth on what the project could mean for them. The students asked questions about wildlife and were curious about environmental impacts of the mine.

Tl'azt'en Nation Council and Tl'azt'en Keyoh holders submitted a letter on March 9, 2026, outlining their concerns with the proposed project and process. Their concerns highlighted the large scale of the proposed mine and tailings storage facility and the severity of any potential failures of the tailings dam given the size and magnitude of the proposed facility, impacts to fish habitat and navigable waters from the project including impacts to salmon and sturgeon, and changes to air quality due to dust, greenhouse gas emissions and diesel particulate matter. Tl'azt'en Nation also expressed concern about cumulative impacts with existing and future forestry, mine and mineral exploration activities in the area.

Stelat'en First Nation raised concerns about the scale of the project, cumulative effects within Stelat'en First Nation's territory, and potential impacts to Aboriginal rights, lands, waters and culturally significant areas. Nadleh Whut'en First Nation did not raise concerns about FPX's IPD.

The Binche Whut'en Keyoh Bu Society, on behalf of Binche Whut'en, indicated that the IPD reflects its preliminary issues and interests related to the project and expressed general support

for FPX's approach to collaboration, consideration of traditional knowledge and project planning to date.

IAAC and the EAO met with Yekooche First Nation on February 4, 2026. Yekooche First Nation provided preliminary comments regarding potential impacts to constitutionally protected rights, governance responsibilities, sites and areas of significance, species of importance such as moose, fish, and medicinal plants, and concerns relating to habitat integrity, cumulative effects associated with large-scale development in the core of Yekooche Territory and ecological sustainability. Potential impacts on land, water quality, country foods, community health, and socio-economic pressures were also raised.

IAAC and the EAO met with Nak'azdli Whut'en in Nak'azdli on February 19, 2026. Nak'azdli Whut'en indicated that it would continue to participate in the assessment process, and raised concerns about the potential impact of project activities on salmon within the watershed and interest from Nak'azdli Keyoh holders on the impacts of access roads and powerlines.

Lake Babine Nation indicated that the IPD reflects some of its preliminary issues and interests related to the project. Lake Babine Nation also provided comments to IAAC and the EAO about the proposed routes of the project's transmission line and impacts this could have on areas of cultural importance and environmental sensitivity.

Substitution

IAAC also received First Nations' views on EAO's request for substitution. Tl'azt'en Nation did not support substitution of the federal impact assessment process and shared that substitution would not adequately address the risks to fish habitat, watersheds, climate and Indigenous rights, which are areas within federal jurisdiction. Stellat'en First Nation indicated that they do not support the substitution of the federal impact assessment process for the project given the scale, duration, and potential environmental and socio-economic implications of the proposed mine and shared the view that a federal impact assessment process is necessary to ensure that the full range of potential impacts are appropriately considered. Nadleh Whut'en First Nation indicated that they do not support the substitution of the federal impact assessment process for the project as they view the federal process is better suited to address impacts to Nadleh Whut'en First Nation's unceded rights and title, and that the B.C. process is inadequate to protect the honour of the Crown in assessing impacts to Aboriginal rights under Section 35 of the *Constitution Act*.

Binche Whut'en Keyoh Bu Society did not oppose substitution but requested additional information from IAAC regarding federal oversight of the assessment and of matters within federal jurisdiction. Yekooche First Nation did not oppose substitution of the federal impact assessment process but indicated that such a process must not diminish federal oversight or the government-to-government relationship. Lake Babine Nation indicated its readiness to participate in a substituted environmental assessment that follows the *Lake Babine – Province of British Columbia Environmental Assessment Collaboration Agreement* (2021).

Comments related to substitution will be considered in the Minister of the Environment, Climate Change, and Nature's decision on substitution for the project. IAAC and the EAO are engaging more deeply with First Nations about substitution and ensuring federal and provincial responsibilities to First Nations are fully carried out.

IAAC and the EAO will continue to work with each Nation's representatives to determine how they wish to be engaged and/or consulted and better understand the concerns that were raised.

Federal, provincial and local government comments

IAAC and the EAO received comments on the IPD from the following federal, provincial and regional government agencies:

- BC Ministry of Environment and Parks;
- BC Ministry of Forests;
- BC Ministry of Mining and Critical Minerals;
- BC Ministry of Citizen's Services – Connectivity Division;
- BC Ministry of Energy and Climate Solutions – Climate Action Secretariat;
- Northern Health Authority;
- BC Ministry of Tourism, Arts, Culture and Sport – Fossil Management Office;
- BC Ministry of Housing and Municipal Affairs;
- BC Ministry of Water, Lands, and Resource Stewardship;
- Crown-Indigenous Relations and Northern Affairs Canada;
- Environment and Climate Change Canada;
- Employment and Social Development Canada;
- Fisheries and Oceans Canada;
- Health Canada;
- Indigenous Services Canada;
- Natural Resources Canada;
- Transport Canada; and,
- Women and Gender Equality Canada.

Provincial and federal agencies' comments included advice regarding requirements for conducting the environmental/impact assessment, and information requirements for provincial and federal permits and authorizations. They provided guidance on additional studies and plans that would be required for the project and details that should be included in the Detailed Project Description, including information about the level of studies that will be available for the project and the engineering design levels for key infrastructure components. Technical advisors also raised questions and concerns regarding baseline studies, modelling and accounting for climate change, cell phone and internet connectivity, and alternative routing for certain sections of proposed access roads.

With respect to potential effects of the project, technical advisors' comments focused on the need to assess and address potential effects on:

- Water quantity and quality in water bodies such as Middle River, Trembleur Lake, and Paula and Sidney Creeks;
- Fish, specifically the Takla-Trembleur-EStu (early Stuart) and Takla-Trembleur-Stuart S (late Stuart) populations of sockeye salmon, and Nechako white sturgeon;
- Wildlife, including species at risk, near the mine site and along the transmission line such as caribou, migratory birds, and mule deer;
- Air quality and health impacts from dust;
- Access and impacts to recreational users;
- Local infrastructure and community services;
- Indigenous peoples, particularly disproportionate impacts on Indigenous women and girls, and potential impact to reserve lands; and
- Socio-economic conditions and health, particularly for Indigenous peoples.

All comments received from provincial and federal technical advisors are available in a tracking table posted on the EAO's [Baptiste Nickel Project information site](#).

Public comments

As part of the Planning and Early Engagement phases, IAAC and the EAO held a joint public comment period from February 5, 2026, to March 9, 2026. During the public comment period, IAAC and the EAO hosted an in-person open house in Fort St. James, British Columbia and a virtual information session. Table 1 summarizes the themes from the submissions received during the public comment period on the [EAO's EPIC.engage website](#) and [IAAC's Canadian Impact Assessment Registry](#).

The majority of the comments received during the public comment period were received from parties who live in the region. Comments generally indicated support of the project provided it benefits the local communities. Commentors emphasized the importance of prioritizing local employment, contracting and procurement for the project. A letter was received by the EAO from residents of Tranquility Bay on Trembleur Lake, a community located approximately 4 kilometers southeast of the proposed project footprint; their concerns included disruption to the local ecosystem, water quality and availability, air quality, noise, and disruption to the community's way of life.

Comments were also received from regional governments and from industry associations. The District of Fort St. James, District of Vanderhoof, the Village of Fraser Lake, the Regional District of Bulkley-Nechako, and the City of Prince George wrote to support economic diversification of the region following declines in the forestry sector, opportunities for significant direct and indirect employment, and multiple business opportunities. The Association for Mineral Exploration B.C. highlighted the project's ability to produce lower-impact nickel and its role in supplying critical minerals for clean technology. It also supported a coordinated and efficient

review of the project by British Columbia and Canada. The Mining Association of British Columbia provided a letter of support for the project, highlighting the project’s ability to provide secure and reliable supplies of critical minerals, long term employment opportunities, and help with global decarbonization.

Table 1 – Summary of Public Comments

Topic Area	Description of Comments
Air Quality	Concerns related to dust produced from the mine site and access roads and the potential risks to respiratory health, vegetation and visibility for other road users, as well as the risks to respiratory health from the project in combination with wildfire smoke and nearby sawmills.
Community Infrastructure, Services and Well-being	Concerns related to the strain on the local housing supply and access to community health services. Comments about the project being able to help support local communities and infrastructure.
Employment	Comments related to the ability to access new employment opportunities after changes to the local forestry industry.
Fish and Fish Habitat	Concerns regarding salmon populations in the Stuart River Watershed that are used for fishing and as a food source, as well as Nechako white sturgeon.
Groundwater and Water Quality	Concerns about the mine acting as a potential risk for local water supplies affecting wildlife, vegetation and drinking water sources, as well as drought conditions and how large water demand could affect future availability.
Human Health	Concerns about how issues related to human health will be tracked, monitored and mitigated.
Noise and Vibration	Concerns about noise and vibration from project-related activities on the quality of life of nearby residents and wildlife.
Soil and Terrain	Concerns about the amount of land that is disturbed due to project-related activities and concerns about reclamation following closure.
Traffic and Road Access	Concerns about the potential for increased traffic through Fort St. James, and some comments regarding a preference for the southern route access proposed by FPX, providing emergency egress to Yekooche First Nation.
Vegetation	Concerns about forest management related to harvesting activities.
Wildlife and Wildlife Habitat	Concerns about the potential for the project to interact with wildlife and wildlife habitat by reducing the amount of viable habitat that is available for wildlife to occupy.

Response to the Joint Summary to meet provincial requirements

As part of preparing the Detailed Project Description and to support the EAO’s Readiness Decision, the EAO requires FPX to respond to all comments submitted to the EAO and IAAC. Responses should indicate how issues have been addressed or will be in a future phase.

Response to the Joint Summary to meet federal requirements

Based on the comments received from First Nations, technical advisors, and the public on the IPD, IAAC has identified key issues for the project. Key issues are listed in Table 2, and are those

that are factors in federal decision-making, have a pathway to an effect within federal jurisdiction, and are a major concern that is raised by a First Nation, federal authorities, provincial ministries, or the public.

IAAC requires that FPX consider these key issues and provide a response. A high-level response is sufficient. Where relevant, FPX is encouraged to identify if the key issues will be addressed through existing legislative and regulatory frameworks (i.e. legislation or regulation), through the application of standard mitigation measures including the standard mitigation measures identified by IAAC, or through FPX’s commitments to best practices, policies or standards, or both.

Table 2 – Key Issues within Federal Jurisdiction

Key Issue	Description
Fish and Fish Habitat	<p>Concerns were raised about adverse effects to fish and fish habitat for:</p> <ul style="list-style-type: none"> • Rainbow trout in the Baptiste Creek watershed from the open pit, and overburden and rock stockpile, and non-contact water diversion; • Early Stuart Sockeye Designatable Unit 20 (DU20) in the Sidney Creek watershed from the temporary ore and overburden stockpile; • Early Stuart Sockeye Salmon (DU20) habitat in Sidney and Paula Creek watersheds from the tailings management facility (TMF), freshwater supply system reservoir, and from increased sedimentation and habitat loss; and • Late Stuart Sockeye Salmon (DU21) habitat in Trembleur Lake. <p>Provide additional information on how options to avoid, or mitigate harmful alteration, disruption or destruction of fish and fish habitat from project effects were considered, including consideration of relocating and redesigning project components.</p> <hr/> <p>The deposition of tailings in waters frequented by fish is subject to the <i>Metal and Diamond Mining Effluent Regulations</i> under the <i>Fisheries Act</i>.</p> <ul style="list-style-type: none"> • Provide conceptual information on how options to avoid, or mitigate harmful alteration, disruption or destruction of fish and fish habitat from the TMF were considered, including consideration of relocating and redesigning project components.

Key Issue	Description
	<p>Concerns were raised about the Nechako white sturgeon listed as endangered under the <i>Species at Risk Act</i> (SARA) and its designated critical habitat at the mouth of Middle River into Trembleur Lake.</p> <ul style="list-style-type: none"> • Provide information on measures to avoid or mitigate effects to the Nechako White Sturgeon, including potential redesign, reconfiguration or relocation of components where feasible to limit impacts to highly sensitive fish and fish habitats. <p>Clarify the process for meaningful engagement and consultation with Indigenous groups in relation to the potential impacts of the project to sockeye salmon and other resident fish species, and how options to avoid, or mitigate harmful alteration, disruption or destruction of fish and fish habitat from project effects were considered, including consideration of relocating and redesigning project components.</p>
Migratory Birds	<p>The construction, operation, and decommissioning of the project could impact migratory birds, including:</p> <ul style="list-style-type: none"> • those listed on <i>Migratory Birds Regulations</i> Schedule 1; and • many of which are also listed on Schedule 1 of the <i>Species at Risk Act</i>. (For those migratory birds that are also species at risk, the conventions under the <i>Species at Risk Act</i> apply on all lands, not just federal lands). <p>The project components and activities may result in individual mortality and the destruction of their habitat, nests and eggs. Well-understood mitigation measures, including the standard mitigation measures identified by IAAC and the Guidelines to Avoid Harm to Migratory Birds, would typically manage potential adverse effects to migratory birds.</p> <ul style="list-style-type: none"> • Provide additional information on any potential effects to migratory birds that are anticipated from the project that would not be managed by standard mitigation measures, and the potential measures to avoid, reduce, and/or offset these effects.

Key Issue	Description
<p>Indigenous Peoples’ Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes and Rights</p>	<p>Concerns were raised about potential effects of the project on species at risk and how these effects could impact Indigenous Peoples’ physical and cultural heritage, current use of lands and resources for traditional purposes, and rights and interests. Provide additional information on the following:</p> <ul style="list-style-type: none"> • Woodland caribou (<i>Rangifer tarandus</i>, Southern Mountain Population) • Whitebark pine (<i>Pinus albicaulis</i>) • Sockeye salmon (<i>Oncorhynchus nerka</i>) • White sturgeon (<i>Acipenser transmontanus</i>; Nechako River population) <p>Provide additional information on critical habitat that may interact with the project and describe how these species may be adversely affected by the project. Describe measures to avoid, lessen or offset the effects of each project activity and stage, and potential monitoring and follow-up measures required. Clarify how the project would comply with the <i>Species at Risk Act</i>.</p>
<p>Impact to Federal Lands</p>	<p>Existing forest service roads along the North Access Route that may be used by the project pass through two Reserves, specifically Binche 2 (Binche Whut’en) for 1995 metres, and Sisul Tl’o K’ut 14 (Tl’azt’en Nation) for 1533 metres.</p> <ul style="list-style-type: none"> • To the extent possible, identify whether any road upgrades will be required within the two reserves and if so, provide additional information (e.g. a description of the extent of land disturbance, potential adverse effects to Indigenous communities, and proposed mitigation).

Conclusion

FPX is now required to carry out the direction of the EAO and respond to IAAC’s key issues found in the Joint Summary. This Joint Summary, along with the additional required materials provided by FPX, will be used to inform IAAC and the EAO’s upcoming assessment decisions.